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13 Attorney for Plaintiffs
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15 IN THE UNITED STATES DISTRICT COURT
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA

17 SAN FRANCISCO/OAKLAND DIVISION

18 **ALAMEDA COUNTY MALE PRISONERS**
19 And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass
20 **PLAINTIFFS,**

21 vs.

22 **ALAMEDA COUNTY SHERIFF'S**
OFFICE, et al

23 **DEFENDANTS.**

No. 3:19-cv-07423 JSC

24 **PLAINTIFF ERIC GONZALEZ'**
REQUEST FOR ENTRY ON LAND –
TO WIT – SANTA RITA JAIL

REQUEST ONE

Hon. Jacqueline S. Corley, Presiding

25
26 TO: Defendant ALAMEDA COUNTY SHERIFF'S OPFFICE, through its attorney of record,
27 GREGORY B. THOMAS and TEMITAYO O. PETERS of BURKE, WILLIAMS & SORENSEN, LLP.
28

1 PROPOUNDING PARTY Plaintiff Daniel Gonzalez serves this request for entry on land of
2 Defendant Alameda County Sheriff's Office as authorized by Federal Rule of Civil Procedure 34(a)(2).
3 Within 30 days after service of this request, Defendant ALAMEDA COUNTY SHERIFF'S OFFICE must
4 respond by stating that inspection and related activities will be permitted or by making objections.

5 Entry on land is requested as follows:

6 Location: Santa Rita Jail, 5325 Broder Boulevard, Dublin, California.

7 Purpose: To view, inspect, document, and perhaps take samples of biological specimens from
8 floors and walls in all common area showers from Housing Units 1,2, 9, 21, and a sample of the common
9 area showers from Housing Units 3, 4, 6, 7 and 8, and the rooms used to stage inmates for court.

10 Date/Period of Time: November 9th through 16th, 2023. Plaintiff is flexible as to scheduling.

11 Attendees: Plaintiffs' counsels, Yolanda Huang, Richard Brody, Thomas Nanney, an expert
12 witness, and a photographer.

13 Entry on land is necessary because plaintiffs have no other means of documenting the conditions
14 of the shower and common areas in the men's housing units. Plaintiffs have requested that class
15 members and plaintiffs be permitted to document these conditions themselves, including with the use of
16 disposable, film cameras, which County defendants have refused.

17 Plaintiffs' counsel and their expert witnesses intend to photograph and videotape these conditions
18 during this inspection, and where possible collect biological samples,

19 Dated: OCTOBER 8, 2023

LAW OFFICE OF YOLANDA HUANG

20 By: /s/ Yolanda Huang
YOLANDA HUANG

22 LAW OFFICE OF THOMAS E. NANNEY

23 By: /s/ Thomas E. Nanney
THOMAS E. NANNEY

25 RICHARD A. BRODY

26 By: /s/ Richard A. Brody
RICHARD A. BRODY

28 ATTORNEYS FOR PLAINTIFFS